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FEDERAL ELECTION COMMISSION
Washington, DC 20463

SENSITIVE

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MEMORANDUM

TO: The Commission

FROM: Lisa Stevenson
Acting General Counsel

Kathleen Guith
Associate General Counsel for Enforcement

BY: Mark Allen *MA (by Allen)*
Assistant General Counsel

Dawn M. Odrowski *DWO*
Attorney

SUBJECT: MUR 6783 (Indian Americans for Freedom, NFPC) – Pre-Probable Cause
Conciliation Agreement;
MUR 6791 (Indian Americans for Freedom, NFPC) – Close the File

Attached is a conciliation agreement in MUR 6783 with Indian Americans for Freedom, NFPC ("IAFF") signed by IAFF's counsel, Anish A. Parikh. Attach. 1. The agreement would settle IAFF's violation of 52 U.S.C. §§ 30116(a)(1)(A) or 30118(a) by republishing in one of its own mailings campaign material prepared by Manju for Congress, the principal campaign committee of congressional candidate Manju Goel. See Second Amended Certification at 4, MURs 6783 and 6791 (Jan. 8, 2016).

For these reasons, we recommend that the Commission accept the attachment agreement and close the file in MUR 6783.

We also recommend that the Commission close the file in the related matter, MUR 6791. MUR 6791, addressed in the same First General Counsel's Report ("FGCR") as MUR 6783, involved allegations by the same Complainant that IAFF filed a 48-Hour Independent Expenditure Report two days late and failed to include adequate disclaimers on its mailings supporting Manju Goel. The Commission vote split 3-3 on the Office of General Counsel's recommendations to dismiss with caution IAFF's reporting violation and find reason to believe that IAFF failed to include adequate disclaimers on some of its mailings. *See* Second Amended Certification at 2, MURs 6783 and 6791 (Jan. 8, 2016). The Commission decided to defer closing the file in MUR 6791 until MUR 6783 was resolved, however, because discussion of common facts and analysis of mailings at issue in both matters made it difficult to prepare a clean, readable redaction of MUR 6783 material from the FGCR for the MUR 6791 public file.

RECOMMENDATIONS:

1. Accept the attached conciliation agreement with Indian Americans for Freedom, NFPC.
2. Close the files in MURs 6783 and 6791.
3. Send the appropriate letters.